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Defendants: *WHITECRYPTON CORPORATION AND*
INTERTRUST TECHNOLOGIES, CORPORATION

[ADDITIONAL COUNSEL LISTED IN SIGNATURE
BLOCK]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WHITECRYPTON CORPORATION,

Plaintiff,

v.

ARXAN TECHNOLOGIES, INC.,

Defendant.

ARXAN TECHNOLOGIES, INC.,

Counter-Claimant,

v.

WHITECRYPTON CORPORATION; and
INTERTRUST TECHNOLOGIES
CORPORATION

Counter-Defendants.

Case No. 3:15-CV-00754-WHO

**STIPULATION AND
ORDER TO CONTINUE CASE
DEADLINES**

Date: N/A
Time: N/A
Courtroom: 02
Judge: Hon. William H. Orrick
450 Golden Gate Avenue
San Francisco, CA

1 Plaintiff and cross-defendants whiteCryption Corporation (“whiteCryption”) and Intertrust
2 Technologies Corporation (“Intertrust”) and defendant and counterclaimant Arxan Technologies,
3 Inc. (“Arxan”) stipulate and agree as follows:

4 1. On February 18, 2015, whiteCryption initiated the above-captioned action against
5 Arxan.

6 2. Arxan answered and counterclaimed against whiteCryption and Intertrust on April
7 10, 2015.

8 3. Between May and June 2015, the parties engaged in motion practice regarding the
9 counterclaims, and on June 18, 2015, the Court granted Intertrust’s motion to dismiss with leave to
10 amend.

11 4. On June 17, 2015, the Court issued a Civil Pretrial Order setting the deadlines in
12 this action. ECF No. 35.

13 5. From June through December 2015, the parties have cooperated on a phased
14 discovery effort to facilitate settlement discussions. The parties, for example, have exchanged
15 several document productions, retained software code comparison experts, and completed code
16 comparisons in an effort to identify and narrow issues for settlement discussions. Document
17 discovery, however, is not complete, nor have the parties yet taken any depositions, in favor of the
18 targeted approach described above in the lead up to a settlement discussion.

19 6. On November 2, 2015, the Court granted the parties’ request for a settlement
20 conference with a magistrate judge and ordered that the parties appear for a conference on January
21 5, 2016.

22 7. In light of the settlement conference and likely continued settlement discussions
23 after the conference if the parties are unable to reach complete resolution on January 5, 2016, the
24 parties agree that continuing all case deadlines by approximately ninety (90) days would assist in
25 the parties settlement efforts, as well as conserve the parties’ and the Court’s resources.

26 8. Neither party has previously requested an extension or modification of any
27 deadlines in the Civil Pretrial Order.
28

Therefore, the parties stipulate and agree, subject to the court's approval, that all case deadlines be extended by approximately ninety (90) days as follows:

| | Current Deadline | Proposed Deadline |
|-------------------------------|-------------------------|---|
| Deadline to amend/add parties | December 31, 2015 | March 31, 2016 |
| Fact discovery cutoff | April 15, 2016 | July 15, 2016 |
| Expert disclosure | April 29, 2016 | July 29, 2016 |
| Expert rebuttal | May 20, 2016 | August 22, 2016 |
| Expert discovery cutoff | June 10, 2016 | September 12, 2016 |
| Dispositive Motions heard by | August 10, 2016 | November 9, 2016 |
| Pretrial Conference | October 7, 2016 | January 23, 2017 (or as the Court's calendar allows) |
| Trial (jury) | November 14, 2016 | February 27, 2017 (or as the Court's calendar allows) |

Respectfully submitted,

Dated: December 18, 2015

By: /s/Michael T. Jones
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Respectfully submitted,

Dated: December 18, 2015

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: December 21, 2015



HON. WILLIAM H. ORRICK
UNITED STATES DISTRICT COURT JUDGE